

Submitted Date	06-Jun-2018 16:32
Total Time Taken	2291.1
Come-back-Later Code	BT7P758HU6
1. Is this an individual response or are you officially responding on behalf of an organisation?	Catholic entity
2. Please provide your name	Anonymous
5. Please indicate the type of Catholic entity you are officially responding on behalf of	Diocese
6. Please indicate the approximate number of Church personnel affiliated with your organisation	1 - 100
Do you consent to your identifying details being published, in addition to your responses, on the CPSL website?	No, I do not want my identifying details published
General feedback relating to the Standards	
1. The National Catholic Safeguarding Standards are: - Easy to understand	Strongly disagree
1. The National Catholic Safeguarding Standards are: - Presented in a logical manner	Disagree
1. The National Catholic Safeguarding Standards are: - User-friendly	Strongly disagree
1. The National Catholic Safeguarding Standards are: - Consistent and accurate in their use of terminology	Agree
2. I/we believe that the National Catholic Safeguarding Standards create conditions that will increase the likelihood of identifying and reporting harm to children in Catholic entities.	Strongly disagree
3. I/we believe that the National Catholic Safeguarding Standards will facilitate appropriate response to disclosures, allegations and suspicions of harm to children in Catholic entities.	Strongly disagree
4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic entities.	Strongly disagree

Please provide further explanation regarding your choice of responses to questions 1 to 4, either by providing a general comment below and/or providing specific comments against each Standard in the next section of the Survey.

5. General/Overall comments on the National Catholic Safeguarding Standards

I can see a lot of well intentioned work has gone into these standards. However there are not 10 Standards - but 43 criteria with 83 Indicators which are specific and measurable. In other words 83 Standards. Way too complicated for small church entities or smaller under resourced diocese to implement to have any meaning to public advertising as meeting or not a so called national standard. Only the biggest city based Diocese will meet the standards and the biggest Church religious organisations. Even then the paperwork compliance will limit monitoring of impact and programs at child level. The Indicators should be examples of implementation and evidence NOT PROSCRIBED measurements or audit-able. These standards are double the size than other comparable legislated regulation for vulnerable people which generally stops at 43 indicators or criteria (see Aged Care/Disability etc State and Federal Standards for example). The only exception is the NSW Child Safe Standards for Permanent Care which are ridiculously large by any comparison to anything else in Australia. Over regulation always leaves to failures and gaps. This draft makes no allowance, and takes no account for what is practicable for the size, ability or resourcing of the entity - a good example is to look at how WH Safety legislation is applied to capacity. On old policy, procedure, process and business maxim, that works in real world is KISS. Keep It Simple Stupid. These Standards are the reverse. They are a copy of typical generic standards to regulate many community and vulnerable person standards. The Catholic Church should be better than this - a leader not a follower of mediocre over processing, common to the secular world that surrounds us. Leadership, vision innovation and practicality is what The Church needs to exhibit, not only to the faithful, but to those in the margins or outside of the faith, who expected

better of The Church in the past. We should be looking upwards from the child's point of view and build from that. Not downwards in a parochial and paternalistic manner on fellow adults to create mass paper warfare. Many organisations meet all sorts of standards for vulnerable persons, all the boxes and accreditation has been met, all the folders full of paper, awards won, plaques given for excellence - and then wide spread abuse still found to occur at service delivery end. I have worked in regulation and accreditation in community services and youth organisational for years and have seen how over regulation fails, and how it can be used to cover, hide or accidentally prevent the very breaches it was trying to avoid because of compliance fatigue. Also as written, some criteria and indicators are repetitive. All repetitions should be deleted.